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June 8, 2023

BY ECF

Hon. Paul G. Gardephe
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Gulkarov, et al., 22 CR 20 (PGG) (SDNY)

Dear Judge Gardephe:

I am writing on behalf of defendant Anthony DiPietro to respectfully request a modification of the defendant's conditions of release which would expand his areas of permitted travel to include the Southern District of Florida so that he may visit more frequently with his family who reside in that district. The government, by AUSA Mathew Andrews, and Pretrial Services have no objection to this request provided that Pretrial Services be notified of Mr. DiPietro's travel before each trip.

By way of background, on January 12, 2022, Judge Moses released Mr. DiPietro on a \$250k personal recognizance bond cosigned by three financially responsible persons, with conditions, *inter alia*, limiting his travel to the Southern and Eastern Districts of New York. In the time since his release, the Court has extended Mr. DiPietro's area of travel to include the Districts of New Jersey and Connecticut.

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Thank you for the Court's consideration on this application; I remain available for a conference should Your Honor deem it necessary.

Respectfully submitted,



Jeffrey Lichtman

cc: Mathew Andrews, Esq.
Assistant United States Attorney (by ECF)

Madalyn Toledo
Pretrial Services (by email)

So Ordered:



Hon. Paul G. Gardephe

Dated: June 13, 2023